

IN THE UNITED STATES DISTRICT
COURT DISTRICT OF
MINNESOTA

IN RE: BAIR HUGGER FORCED AIR MDL No.: 15-md-02666 (JNE/DTS)
WARMING PRODUCT LIABILITY
LITIGATION

This Document Relates To:

Carla Walters vs. 3M Company, et al,
Civ. No. 0:18-cv-2764 (JNE/DTS)

DECLARATION OF AMBER M. PANG PARRA
IN SUPPORT OF PLAINTIFF'S RESPONSE
TO DEFENDANTS' MOTION TO DISMISS

I, Amber Marie Seu Yin Pang Parra, declare as follows:

1. I am an attorney at Justinian & Associates PLLC.
2. I submit this declaration in opposition to Defendants' Ninth Motion to Dismiss for Failure to Comply with PTO 23 and FRCP 41(B) and 25(A), or for Lack of Standing [Dkt. 2028], filed on July 3, 2019.
3. Ms. Walters contacted our firm regarding injuries that were allegedly caused by the Bair Hugger patient warming device.
4. Certain medical records and billing records pertaining to Ms. Walters; treatment were obtained by undersigned Counsel. Those records indicated that a Bair Hugger device was used during Ms. Walters' index orthopedic surgery.

5. Counsel worked with Ms. Walters to complete the plaintiff fact sheet (“PFS”).
6. A completed PFS, with signed authorization and verification forms were submitted on December 6, 2018, via online portal
7. Upon receiving a deficiency notice related to the PFS, Counsel attempted to contact Ms. Walters, to work on corrections.
8. Counsel was notified of Ms. Walters’ death by her son Patrick Walters on February 12, 2018. Mr. Walters indicated that Counsel would be notified if a personal representative, administrator, executor or other appropriate person was appointed.
9. Counsel filed the Suggestion of Death on March 13, 2019.
10. Counsel has since been unable to make contact with Patrick Walters or anyone from Ms. Walters’ family.

Pursuant to 28 U.S.C. § 1746(2), I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 9, 2019

/s/Amber M. Pang Parra
Amber M. Pang Parra

